

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CYNOSURE, LLC, a Delaware limited liability company; and LOTUS PARENT, INC., a Delaware corporation;

Plaintiffs,

v.

REVEAL LASERS LLC; a Nevada limited liability company, *et al.*

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**DEFENDANTS' REQUEST FOR STATUS CONFERENCE
AND BRIEFING SCHEDULE FOR POST-TRIAL FILINGS**

Defendants Bob Daley, Chris Chambers, Reveal Lasers LLC, and Reveal Lasers, LTD (“Reveal” or “Defendants”), by and through their attorneys of record, request that this Court schedule a status conference, as mentioned by Judge Saris, following the jury’s verdict in this case, set a briefing schedule for post-trial filings, and schedule an expedited hearing. In support of this request, Defendants respectfully states as follows:

1. Jury Verdict: On September 27, 2024, the jury returned a verdict in the above-captioned matter.
2. Post-Trial Motions: In light of the jury’s verdict, Defendants intend to file a renewed motion for judgment as a matter of law and a motion for a new trial or remittitur.
3. Status Conference: Judge Saris indicated that a status conference will be held the week of September 30, 2024. Defendants request that the Court hear the following issues:
 - Briefing schedule for post-trial motions, including deadlines for responses and replies;

- Scheduling expectations for hearings and rulings on any post-trial motions; and
- Addressing any other post-verdict matters, including remaining live claims and Individual Defendants.

4. Briefing Schedule and Expedited Hearing: Given the nature of the issues involved and the detrimental implications of the jury's erroneous verdict on Reveal's business, including the 100 individuals the company employs, Defendants request the Court's hearing of these matters on an expedited basis.

5. Pursuant to Rule 54(b), Defendants request that the Court delay entry of judgment until a determination is made as to the remaining claims and Defendants to this action.

For the foregoing reasons, Defendants respectfully request that the Court set a status conference as soon as possible during the week of September 30, 2024.

Dated: September 30, 2024.

Respectfully Submitted,

ORIGINAL DEFENDANTS,

By their attorneys,

/s/ A. Madison Dini

Gerald B. Hrycyszyn, BBO# 675201

Michael A. Albert, BBO# 558566

Wolf, Greenfield & Sacks, P.C.

600 Atlantic Avenue

Boston, MA 02210

Telephone: (617) 646-8000

Facsimile: (617) 646-8646

ghrycyszyn@wolfgreenfield.com

michael.albert@wolfgreenfield.com

A. Madison Dini (admitted *pro hac vice*)
MICHELMAN & ROBINSON, LLP
717 Texas Avenue, Suite 3100
Houston, Texas 77002
Telephone: (713) 422-2121
Facsimile: (713) 383-6151

mdini@mrllp.com

Enrico S. Trevisani (admitted *pro hac vice*)
MICHELMAN & ROBINSON, LLP
605 Third Avenue, 30th Floor
New York, New York 10158
Telephone: (212) 730-7700
Facsimile: (212) 730-7725
etrevisani@mrllp.com

Ashley N. Moore (admitted *pro hac vice*)
GREENBERG TRAURIG, LLP
2200 Ross Avenue, Suite 5200
Dallas, Texas 75201
Telephone: (214) 665-3600
Facsimile: (214) 665-3601
Ashley.Moore@gtlaw.com

CERTIFICATE OF SERVICE

I, A. Madison Dini, hereby certify that on September 30, 2024, a copy of the foregoing document was served on counsel for all appearing parties via the ECF filing system.

/s/ A. Madison Dini
A. Madison Dini